



December 27, 2022

**VIA ECF**

The Honorable Paul G. Gardephe  
United States District Court  
Southern District of New York  
40 Foley Square, Room 2204  
New York, NY 10007

**Re: Farhad Azima v. Dechert LLP, et al. Civil Case No. 22-cv-8728 (PGG)**

Dear Judge Gardephe:

We have recently been retained by defendant David Neil Gerrard to represent him in the above-referenced matter. Plaintiffs have filed an affidavit of service stating that service was completed on December 7, 2022 and that Mr. Gerrard's answer or other response to the complaint is due December 28, 2022.

We write to respectfully request the time for Mr. Gerrard to respond to the complaint be extended until January 10, 2023. The extension is requested to allow counsel to fully review and analyze the lengthy complaint and submissions in this matter and to prepare a response.

We requested Plaintiffs' counsel consent to this extension. However, if Mr. Gerrard intends to file a pre-motion letter, Plaintiffs' counsel was only willing to consent to an extension until January 4, 2023 in light of a Rule 16 conference scheduled for the January 12. While the 10<sup>th</sup> is preferable, we offered the 9<sup>th</sup> as a compromise to provide Plaintiffs time to respond to any pre-motion letter we may file in advance of the conference. We have not received a response to that proposal, or several calls to discuss, and understand that Plaintiffs' counsel is traveling this week and may be unavailable. Due to the current deadline, we are making this submission prior to receiving a response to our latest proposal.

Due the timing of our retention, the holidays, and the size and complexity of the complaint and the record which includes related litigation in the United Kingdom, we believe the 10<sup>th</sup> would provide us sufficient time to answer or submit a pre-motion letter.

Should the Court wish to have the response to any pre-motion letter that may be filed on Mr. Gerrard's behalf, we would propose we submit our letter on the 9<sup>th</sup> with the response filed prior to the conference (or alternatively, adjourning the conference to provide Plaintiffs additional time to respond).

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If the Court does not require Plaintiffs' letter in response, we are amenable to extending Plaintiffs' counsel time to respond to any submission as they believe is necessary.

Thank you for your consideration of this request.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "E. Bolla", with a large, stylized initial "E" and a long horizontal flourish extending to the right.

Evan W. Bolla